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Attorneys for Defendant,
FCA US, LLC

15 **UNITED STATES DISTRICT COURT**

16 **EASTERN DISTRICT OF CALIFORNIA**

17 WARREN HANNING MITCHELL,

18 Plaintiff,

19 v.

20 FCA US, LLC; and DOES 1 through
21 10, inclusive

22 Defendants.
23

Case No. 2:22-cv-00926-DJC-JDP

**JOINT STIPULATION
REGARDING PLAINTIFFS' FEES,
COSTS AND EXPENSES AND
REQUEST FOR ENTRY OF ORDER**

24
25 **TO THE HONORABLE COURT AND ALL PARTIES AND THEIR**
26 **ATTORNEYS OF RECORD:**
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1 This Stipulation is entered into by and between Plaintiff WARREN
2 HANNING MITCHELL (“Plaintiff”) and Defendant, FCA US, LLC (“Defendant”),
3 through their respective counsel of record.

4 WHEREAS, Plaintiff WARREN HANNING MITCHELL accepted
5 Defendant FCA’s Offer of Judgment Pursuant to Fed. R. Civ. P. 68 on November 6,
6 2023.

7 WHEREAS, the counsel for the parties have met and conferred and have
8 reached an agreement, in lieu of Plaintiff’s counsel filing a Motion for Attorneys’
9 fees, costs, and expenses, Defendant FCA US, LLC is to pay fees, costs, and
10 expenses in this matter for the sum of \$12,000.00. Such funding shall be satisfied by
11 February 12, 2024. After satisfaction of payment, Plaintiff will dismiss this case with
12 prejudice within 10 business days against all parties.

13 Parties hereby apply for the entry of Order in the amount of \$12,000.00 for
14 Plaintiff’s Attorneys’ Fees, Costs, and Expenses as outlined in this Stipulation.

15
16 **IT IS SO STIPULATED.**

17 Dated: December 11, 2023

**STRATEGIC LEGAL PRACTICES,
APC**

19 /s/ Tionna Carvalho

20 Tionna Carvalho
21 Attorney for Plaintiff
WARREN HANNING MITCHELL

22 Dated: December 11, 2023

**GORDON REES SCULLY
MANSUKHANI, LLP**

25 /s/ Trina Clayton

26 Trina Clayton
27 Attorney for Defendant
FCA US, LLC

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